

1 KAREN P. HEWITT
United States Attorney
2 EUGENE S. LITVINOFF
Assistant U.S. Attorney
3 California State Bar No. 214318
Federal Office Building
4 880 Front Street, Room 6293
San Diego, California 92101-8893
5 Telephone: (619) 557-5790

6 Attorneys for Plaintiff
United States of America

7 UNITED STATES DISTRICT COURT
8 SOUTHERN DISTRICT OF CALIFORNIA

9 UNITED STATES OF AMERICA,)	Criminal Case No. 08CR0366-DMS
10 Plaintiff,)	
11 v.)	MOTION FOR ORDER SHORTENING
12 JAMES HAYNES III,)	TIME AND ORDER THEREON
13 Defendant.)	
14)	

15 COMES NOW the plaintiff, UNITED STATES OF AMERICA, by and through its
16 counsel, Karen P. Hewitt, United States Attorney, and Eugene S. Litvinoff, Assistant U.S.
17 Attorney, and hereby moves this court for an order shortening time to allow the filing of
18 the government's response and opposition to defendant's motions to: (1) compel
19 discovery; (2) preserved evidence; (3) dismiss the indictment; (4) produce grand jury
20 transcripts; (5) suppress evidence; (6) suppress statements; (7) sever counts; and (8)
21 request leave to file further motions to Monday, March 24, 2008. As a basis for this
22 request, undersigned counsel states that he attempted to file said respond and opposition
23 on March 21, 2008 while out of the district using his government-issued laptop computer,
24 but encountered technical problems that prevented him from filing said motion.

25 //

26 //

27 //

28

1 Undersigned counsel returned to the district on March 24, 2008, where he was able to file
2 said motion from the U.S. Attorney's Office.

3 DATED: March 24, 2008.

4 KAREN P. HEWITT
5 United States Attorney

6 /s/ Eugene S. Litvinoff
7 EUGENE S. LITVINOFF
8 Assistant U.S. Attorney
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

O R D E R

IT IS HEREBY ORDERED that the time for filing the government's response and opposition to defendant's motion for * in United States v. James Haynes III, Case No. 07cr0366-DMS, be shortened to March 24, 2008.

SO ORDERED.

DATED: _____.

HONORABLE DANA M. SABRAW
United States District Judge

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Case No. 08CR0366-DMS

Plaintiff,

v.

CERTIFICATE OF SERVICE

JAMES HAYNES III,

Defendant.

IT IS HEREBY CERTIFIED THAT:

I, EUGENE S. LITVINOFF, am a citizen of the United States and am at least eighteen years of age. My business address is 880 Front Street, Room 6293, San Diego, California 92101-8893.

I am not a party to the above-entitled action. I have caused service of **UNITED STATES MOTION FOR ORDER SHORTENING TIME AND ORDER THEREON** on the following parties by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which electronically notifies them.

1. David M. Peterson, Esq.

I hereby certify that I have caused to be mailed the foregoing, by the United States Postal Service, to the following non-ECF participants on this case:

None.

the last known address, at which place there is delivery service of mail from the United States Postal Service.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 24, 2008.

s/ Eugene S. Litvinoff
EUGENE S. LITVINOFF